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July 9, 2024

VIA ECF FILING

The Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007-1312

**APPLICATION GRANTED
SO ORDERED**

John G. Koeltl
John G. Koeltl, U.S.D.J.
7/10/24

Re: Kaiser Aluminum Warrick, LLC v. US Magnesium, LLC, Case No. 1:22-cv-3105 (JGK)

Dear Judge Koeltl,

We are counsel for US Magnesium, LLC (“US Mag”) and write, pursuant to Rule I(E) to the Court’s Individual Practices, to request a seven (7) day adjournment of the deadline to file reply papers to the parties’ cross-motion motions for summary judgment.

As per the Court’s order, dated May 24, 2024 (ECF No. 145), the present deadline for the parties’ respective replies is July 15, 2024.

On June 8, 2024, we approached counsel for Kaiser Aluminum Warrick, LLC (“Kaiser”) seeking their consent to extend the deadline by seven (7) days for both parties. Counsel for Kaiser kindly consented to the request on behalf of their client.

The extra time is necessitated by the fact that counsel for US Mag, which has only recently assumed the lead counsel role in this case, is still getting caught up on all of the discrete and salient factual issues in this case, and the summer travel and family schedules (including the 4th of July holiday week) has impacted its bandwidth. Moreover, the undersigned counsel has a conflicting deadline to file an significant appellate brief on July 16, which obligation pre-dates the events that led to counsel taking over the lead role in this case.

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If the request is granted, the new deadline for the parties to file reply papers to the summary judgment cross-motion motions would be July 22, 2024.

Respectfully submitted,

/s/ Martin S. Krezalek

Martin S. Krezalek

cc: All counsel of record (via ECF)